

## **Modern Slavery Act Transparency Statement**

### **Introduction**

We, LBG Media plc and our group companies (the **Group**), are a multi-brand, multi-channel digital entertainment business, with a global audience of over a billion operating across all major social platforms and our websites.

As a leading digital entertainment business with a focus on young adults, we are aware that we have a powerful global platform to push a socially responsible agenda, represent our audience and enable those that do not have equal opportunities to have their voices heard. This is shown in our mission statement: to give young adults a voice by building communities that laugh, think and act. The Group has been widely recognised across the industry for its impactful and perception changing campaigns. Further details on our business model and how the Group recognises the importance of being an environmentally and socially responsible business, can be found within [the LBG Media plc annual report and accounts for the year ended 31 December 2023](#).

We are committed to improving our practices to combat slavery and human trafficking anywhere within our business and supply chains. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's, slavery and human trafficking statement for the financial year ended 31 December 2023.

### **Organisation structure**

LBG Media plc is the ultimate parent company of the Group and each of its wholly owned subsidiaries listed below. The Group (excluding Betches Media, LLC) had a global annual turnover of over £67.5 million year ended 31 December 2023.

- LBG Holdco Limited
- LADbible Group Limited
- Studio Joyride Limited
- FOODbible Limited
- CONTENTbible Limited
- GAMINGbible Limited
- Pretty52 Limited
- LASSbible Limited
- ODDSbible Limited
- SPORTbible Limited
- LADbible Limited
- UNILAD Group Limited
- LADbible Australia Pty Limited
- LADbible New Zealand Limited
- LADbible Ireland Limited
- LBG Holdco US Inc.
- LADbible US Inc.

- Betches Media, LLC

### **Supply chains**

Our suppliers include content providers, event management companies, large and small technology and software suppliers, IT and other office equipment suppliers, branded merchandise providers, professional services and office cleaning and other office facilities services.

The Group is not aware of any slavery or human trafficking in any part of its business or supply chain and no such issues were raised during the financial year ended 31 December 2023. The Board has overall responsibility for risk management within the Group which is reviewed regularly to ensure risk controls are in place. The risk of slavery or human trafficking in any part of its business or supply chain, is considered low and not a principal risk of the Group.

### **Steps taken to combat slavery and human trafficking**

We have measures in place to identify, assess, mitigate and monitor the risk of slavery and human trafficking in our supply chains, as follows:

- The Group's suppliers are subject to scrutiny and supplier onboarding processes which act as due diligence and compliance tools for the Group.
- The majority of our suppliers adhere to our standard Supplier Terms and Conditions (**Supplier Ts&Cs**) or alternative contractual terms are negotiated which are subject to rigorous legal review. The Supplier Ts&Cs contain anti-slavery and human trafficking provisions, anti-bribery and anti-corruption provisions and more generally, provisions relating to complying with all applicable laws and regulations.
- The Supplier Ts&Cs contain notification requirements in the event that a supplier becomes aware of any actual or suspected breach of anti-slavery and human-trafficking (and anti-bribery, anti-corruption) laws and regulations. The Supplier Ts&Cs also oblige our suppliers to contract with their subcontractors on a similarly onerous contractual basis. The Group reserves its right to immediately terminate the relevant supplier contract in the event of a breach of these provisions and to inspect/request (if required) a supplier's premises/records of compliance.
- If a supplier has not signed up to the Supplier Ts&Cs, the supplier would be subject to a separate negotiated agreement with the relevant entity in the Group. Each such contract would generally contain provisions relating to complying with all applicable laws and regulations. For suppliers representing a higher risk or vulnerability to slavery and human trafficking in their business or supply chains the Group would include more specific contractual obligations in relation to anti-slavery and human trafficking, anti-bribery and anti-corruption. The Group would assess higher risk suppliers by reference to the sector/industry and location in which they operate and the type of supplier and their relationship to the Group (for example, transaction/business risk assessment and a product/materials risk assessment). The in-house legal, finance and compliance

teams are involved in assessing such 'higher risk' contract negotiations and supplier due diligence and seek specialist advice if required.

- The Directors of LBG Media plc support a high standard of corporate governance and voluntarily observe the Quoted Company Alliance's Corporate Governance Code (2018) (the **QCA Code**) since the admission of LBG Media plc on the London Stock Exchange's Alternative Investment Market in December 2021. The Directors believe that the QCA Code provides the Group with a framework to ensure that the right standards of governance are established, enabling a strong governance culture to be embedded as part of building a successful and sustainable business for all of the Group's stakeholders. Principles 3 and 4 of the QCA Code provide that the Board: (i) must take into account wider stakeholder and social responsibilities and their implications for long-term success and (ii) embed effective risk management, considering both opportunities and threats, throughout the organisation. Further details of the Group's compliance with the QCA Code and the Board's assessment of the principal and emerging risks to the Group can be found in [the LBG Media plc annual report and accounts for the year ended 31 December 2023](#).
- The Group has appropriate policies in place that underpin our commitment to a sustainable and responsible business. These policies are continuously reviewed and updated, and set out in the employee handbook, which is provided to all employees upon their commencement of employment and available throughout the duration of their employment in an easily accessible portal. The policies and the handbook more generally are designed to ensure that all staff conduct the business in an honest, fair, transparent ethical manner and to protect whistleblowers.

The Group shall continue to undertake due diligence and monitor the risks of modern slavery and human trafficking in its supply chains and operations, implement measures internally and externally, to the extent necessary, to tackle any risk of slavery and human trafficking.

### **Approval**

This statement was approved by the Board of Directors of LBG Media plc on 23 May 2024.

**Alexander Solomou**  
**Chief Executive Officer**  
**on behalf of the Group**

Date: 23 May 2024